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January 27, 2021

BY ECF

Hon. Ramon E. Reyes, Jr. Eastern District of New York 225 Cadman Plaza East, Rm. N208 Brooklyn, New York 11201

Re: Charber Consultants LLC et al. v. Mask Medical LLC, et al.,

20-CV-2891 (LDH) (RER)

Dear Magistrate Judge Reyes:

This firm represents Plaintiffs in the above-referenced action. I write on behalf of all parties to advise the Court of a recent development and to request Your Honor's approval of a two-week adjournment of the deadlines for jurisdictional discovery and to amend the complaint/add new parties.

On January 20, 2021, Defendant Gauravjit Singh was arrested and charged by the United States Attorney's Office for the District of New Jersey with one count of wire fraud, under 18 U.S.C. § 1343, apparently arising from the transactions at issue in this case. Mr. Singh's attorneys have indicated to me that they intend to seek a stay of this case; we looking into the matter and are in discussions with Defendants' counsel regarding this issue. To allow time for those negotiations, the parties respectfully request that the upcoming deadlines for the completion of jurisdictional discovery and to amend the complaint or add new parties be extended by two weeks from January 31, 2021 to February 14, 2021. If the parties are unable to reach agreement this week on how to proceed, we will advise the Court in the joint status report due on February 1, 2021.

We thank the Court for its attention to this matter, and would be happy to answer any questions or provide any additional information that Your Honor may require.

Respectfully submitted,

Bradley J. Nash

cc: Counsel of Record (by ECF)